

MEL:JRS
F. #2019R00439

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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COMPLAINT

UNITED STATES OF AMERICA

(21 U.S.C. § 846)

- against -

Case No. 19-M-499

RHADAMES PEREZ, also known as
“Roddy,”

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT D. DUNN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

In or about and between August 2018 and May 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RHADAMES PEREZ, also known as “Roddy,” together with others, did knowingly, intentionally and unlawfully conspire to distribute and possess with intent to distribute a substance containing fentanyl, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841.

(Title 21, United States Code, Section 846)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with HSI and have been involved in the investigation of numerous cases involving distribution of narcotics. I am familiar with the facts and circumstances set forth below from my personal involvement in this investigation, my review of documents, records and reports, and from reports made to me by other law enforcement detectives and personnel. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. The defendant RHADAMES PEREZ has been under investigation by HSI and the New York City Police Department ("NYPD") for trafficking fentanyl since 2018.

3. Beginning in or about August 2018 and continuing through on or about May 29, 2019, an undercover NYPD police officer (the "UC") met with PEREZ on approximately eleven occasions in Brooklyn and Queens, New York, and made purchases of narcotics. These purchases were video and audio recorded using a covert recording device.

4. Samples of the packets of narcotics purchased from PEREZ were tested at an NYPD laboratory. Several of the packets tested positive for a mixture of heroin and fentanyl. Other packages tested positive for heroin only.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. In total, the UC purchased packets containing approximately 50 grams of heroin or mixtures of heroin and fentanyl from PEREZ. Of the packets tested, approximately 3 grams were found to contain a mixture of heroin and fentanyl.

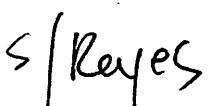
6. On or about May 29, 2019, the UC met with PEREZ to arrange a purchase of narcotics. PEREZ stated, in sum and substance, that he was going to get the drugs and then walked to and entered a residence on Grandview Avenue, in Queens, New York. When PEREZ exited the residence, he was arrested and narcotics were found on his person.

7. Following his arrest, PEREZ was advised of his Miranda rights, which he acknowledged and waived. During a post-arrest interview, PEREZ admitted to selling heroin. PEREZ also stated that he was aware that some of the heroin he sold contained fentanyl.

WHEREFORE, your deponent respectfully requests that the defendant RHADAMES PEREZ, also known as "Roddy," be dealt with according to law.


ROBERT D. DUNN
Special Agent
U.S. Department of Homeland Security,
Homeland Security Investigation

Sworn to before me this
31st day of May, 2019


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